



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 10, 2024

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reclaim the Records, et ano., v. U.S. Dep't of State*, 23 Civ. 1650 (JPC)

Dear Judge Cronan:

This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. On behalf of the Government, I write respectfully to request a 45-day extension of the May 13, 2024 deadline for the Government to file its reply papers in further support of its motion for summary judgment, to June 27, 2024.

This is the first request by the Government for an extension for its reply papers, but the Court previously granted several extensions to the parties. The extension is necessary because the Government needs more time to arrange for a declaration from an agency contractor to respond to the technical points raised by the declaration of Mr. Schnell, which accompanied Plaintiffs’ opposition. In addition, the Government intends to submit a supplemental declaration from Ms. Regina Ballard to address the parties’ declarations/arguments, but she will be away the end of this month. Plaintiffs consent to the requested extension.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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